



January 12, 2004
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
32 - Monthly Report; December 1 – December 31, 2003 Reporting period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting. This report is for the December 1 – December 31, 2003 reporting period.

Sincerely,

Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Linda Tape – Husch & Eppenberger
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
Jeff Klieve - Monsanto

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: January 9, 2004

Period Covered: December 1, 2003 – December 31, 2003

Solutia and 14 of its U.S. subsidiaries filed voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code on December 17, 2003.

Work Performed during the reporting period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*
- *Collected samples for the December 2003 quarterly sampling of the groundwater monitoring wells around the containment cell. Samples will be analyzed for parameters in the Draft Groundwater Monitoring Plan Revision 01.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remained under review. Portions of the Plan applicable to the placement of sediments have already been approved.*
- **Performed inspections of the site.**
- **Maintained operation of the 50-gpm stormwater treatment system.**
- **Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.**
- **Maintained stormwater and leachate collection controls around the containment cell.**

- **Monitored support area facilities.**

Dead Creek

Received U.S. EPA's comments for:

- *Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- *Human Health Risk Assessment, Sauget Area One Site, Illinois.*

Solutia provided a general response on December 4, 2003 and requested a meeting with the Agencies. There are several substantive issues that need to be discussed and resolved before we can move forward with preparation of plans that will ultimately result in the completion of the remedy for Dead Creek.

Data Submittal

No data are submitted with this report.

Work scheduled for next reporting period

- **Conduct routine inspection of the containment cell.**
- **Continue operation of the 50-gpm stormwater treatment system.**
- **Change filter sand and gravel in the 1st stage filter of the treatment system.**
- **Change carbon in the 2nd stage filter of the treatment system.**
- **Replace lids on the two carbon tanks of the 2nd stage filter of the treatment system.**
- **Perform necessary operation and maintenance on the containment cell and temporary treatment system.**
- **Analyze groundwater samples for parameters in the Draft Groundwater Monitoring Plan Revision 01.**

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PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

Submittal Schedule Status

See attached UAO schedule

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	May 22, 2002

January 12, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order
(UAO) Groundwater Operable Unit
13 - Monthly Report; November 1 – November 30, 2003 Reporting Period**

Dear Mr. Fayoumi,

Attached is the Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports. This report is for the December 1 - December 31 reporting period.

Sincerely,
Solutia Inc.

Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Bardo, Ken - U. S. EPA
Sandra Bron – IEPA
Richard Williams – Solutia
Cathleen Bumb – Solutia
Mayor Frank Bergman – Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor P. Sauget - Sauget, IL
Mike Coffey - U. S. Fish & Wildlife Service
Linda Tape – Husch & Eppenberger
Jeff Klieve - Monsanto

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Monthly Report

Date of Report: January 9, 2004

Period Covered: December 1 - December 31, 2003

Agency Actions / Communications

In an e-mail message dated June 19, 2003, U. S. EPA requested the submission of revised versions of the Focused Feasibility Study, the Remedial Design Work Plan, and the Pre-Final (95%) Remedial Design. The revisions were required to allow the use of a slurry wall rather than jet grouting for construction of the barrier wall. The revised documents were submitted on July 3, 2003. The ESD was issued by US EPA on July 30, 2003. The Final Design Submittals were approved by EPA on October 16, 2003.

Work Performed During the Reporting Period

Slurry Wall

- Total excavation through December = 219,712 sq ft.
- Total backfill placed through December = 81,325 sq ft.

The excavation continued toward the south to approximately station 10+40. The trench profile is attached. Inquip worked two shifts from December 1 through December 16.

The box culvert was grouted between December 2 and December 8.

Solutia and 14 of its U.S. subsidiaries filed voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code on December 17, 2003.

Groundwater Treatment

Solutia will maintain responsibility for pumping and treating groundwater.

The Sauget Area 2 Groundwater Migration Control System pumped at a variable rate in December based on river level.

Effluent pumping data for each well is attached. The river level is quite variable and therefore the pumping rates are variable. Attempts to optimize the control system to reduce variability of pumping rates while still maintaining gradient control has resulted in some improvement.

Schedule

Following Solutia's filing of voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code, Inquip was advised to stop work on the slurry wall excavation until funding issues are resolved.. This had little effect for the month of December since only 4 days were scheduled during the last two weeks of the month.

Submittals in December

- A letter describing the reasons that the barrier wall spec required chang was submitted on December 2, 2003.
- A letter to notify EPA that the slurry wall would not be completed before the end of March 2004 was submitted on December 8, 2003.
- A letter describing the process for grouting and cutting the box culvert was submitted on December 8, 2003.
- A letter to notify EPA of Solutia's Chapter 11 filing was submitted on December 17, 2003.

Work scheduled for next reporting period

Continue pumping and treating groundwater per the lookup table based on river level.

Backfill the open trench.

BCC: (via e-mail only)

C. Bumb
B. Yare - 1S
L. Tape – Husch & Eppenberger, LLC
J. Lebold – 1740
M. Peal
S. Wendler - 3S
D. Ridenhower - 1740
A. Faust - 3N
R. Williams – Williams & Associates

SLURRY WALL PROFILE

PUMPING RATES AND PIEZOMETER LEVELS

January 12, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report December 1 – December 31, 2003**

Dear Mr. Fayoumi,

Enclosed is the Sauget Sites Area I Monthly Report for the December 2003 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Linda Tape – Husch & Eppenberger
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
Jeff Klieve - Monsanto

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: January 9, 2004
Period Covered: December 1, 2003 - December 31, 2003

Solutia and 14 of its U.S. subsidiaries filed voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code on December 17, 2003.

Work Performed during the reporting period

Borrow Pit Lake

Sediment sampling in the Borrow Pit Lake commenced on May 6, 2003 and was completed on May 14, 2003. All sampling activities were observed on a full time basis by a USEPA oversight contractor. No deficiencies or problems were identified by the oversight personnel during the sampling. Samples were shipped to the analytical laboratories identified in the QAPP for analysis. Laboratory results were validated. The draft report was submitted to the Agency on September 2, 2003.

The BPL ecological assessment was conducted on October 20-22. EPA oversight was in attendance.

Dead Creek

Received U.S. EPA's comments for:

- *Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- *Human Health Risk Assessment, Sauget Area One Site, Illinois.*

Solutia provided a general response on December 4, 2003 and requested a meeting with the Agencies. There are several substantive issues that need to be discussed and resolved before we can move forward with preparation of plans that will ultimately result in the completion of the remedy for Dead Creek.

DNAPL Work Plan

Comments were received on the DNAPL Investigation Work Plan that was submitted to the Agency on February 28, 2003. Responses to these comments were submitted to the Agencies on May 13, 2003. The Agency responded on July 24, 2003 requiring Solutia to submit responses and an approvable DNAPL Work Plan that will address all focus areas and information requested in the January 9, 2003, U.S. EPA Additional Work Letter. The response to comments and the Work Plan were submitted to the Agency on August 14, 2003. Comments were received from the Agencies on October 15 and a response was sent on November 3.

Conditional approval of the DNAPL Workplan was received on December 23, 2003 which requires completion of the investigation and submittal of the DNAPL Report by June 23, 2004.

Attachments

There are no Technical Memoranda or data submittals with this report.

Work scheduled for next reporting period

- *prepare report of the Habitat Assessment.*

Submittal Schedule Status

No submittals are currently scheduled.